

Christopher A. Carr (#44444)  
ccarr@afrc.com  
Viddell Lee Heard (#175049)  
vheard@afrc.com  
ANGLIN, FLEWELLING, RASMUSSEN,  
CAMPBELL & TRYTTEN LLP  
199 S. Los Robles Ave., Suite 600  
Pasadena, California 91101-2459  
Tel: (626) 535-1900  
Fax: (626) 577-7764

Attorneys for Defendant  
WELLS FARGO BANK, N.A., successor  
by merger with Wells Fargo Bank Southwest, N.A.,  
f/k/a Wachovia Mortgage, FSB, f/k/a World Savings Bank, FSB

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

NADER SHATERIAN,	)	CASE NO. C 11-00920-SC
	)	
Plaintiff,	)	[Assigned to the Honorable Judge Samuel Conti]
	)	
vs.	)	<b>STIPULATION AND ORDER FOR</b>
	)	<b>CONTINUANCE OF NOVEMBER 29, 2011</b>
WELLS FARGO BANK, NATIONAL	)	<b>CASE MANAGEMENT CONFERENCE</b>
ASSOCIATION; CAL-WESTERN	)	
RECONVEYANCE CORPORATION;	)	
and DOES 1-50, Inclusive	)	Date: to be reset
	)	Time: to be reset
Defendants.	)	Courtroom: 1
	)	

By this stipulation, the parties to this action request that the Court continue the Case Management Conference in this action, currently scheduled for November 29, 2011, for approximately 60 days.

The reasons for this request are as follows. First, the parties have recently been having productive discussions regarding a potential settlement, and would like to direct their energies toward those discussions in advance of the Case Management Conference. Second, the parties are continuing to analyze the Court's November 7, 2011 Order regarding the motion to dismiss and to determine the Order's effect on various case management and settlement issues. Third, defendant

Cal-Western Reconveyance Corporation filed a Declaration of Non-Monetary Status prior to the case being removed to Federal Court. Plaintiff contends that this Declaration was not effective to make Cal-Western a Nominal Party, because the case was removed to Federal Court before 15 days had passed from the date the Declaration was filed, and Plaintiff subsequently filed an Objection to the Declaration of Non-Monetary Status (Doc #15). Cal-Western filed a Reply to this opposition (Doc. #36), but the Court has not ruled as to whether Cal-Western is or is not a nominal party. Fourth, Nicole Neff of the Wright Finley firm, counsel for defendant Cal Western, is on her honeymoon until November 30, and it is desired that she participate in the conference and the parties' other discussions.

### STIPULATION

Plaintiff Nader Shaterian ("Plaintiff") and Defendants Wells Fargo Bank, N.A. and Cal-Western Reconveyance Corporation, by and through their respective counsel, hereby stipulate and request this Court continue the Case Management Conference currently scheduled for November 21, 2011 for approximately 60 days, with a corresponding continuance for the filing of a joint Case Management Statement.

Dated: November 21, 2011

ANGLIN, FLEWELLING, RASMUSSEN,  
CAMPBELL & TRYTTEN LLP

By: /s/ Viddell Lee Heard  
Viddell Lee Heard  
Attorneys for Defendant Wells Fargo  
Bank, National Association

BLOOMFIELD LAW GROUP, INC.  
A Professional Corporation

By: /s/ Neil Jon Bloomfield  
Neil Jon Bloomfield  
Attorneys for Plaintiff Nader Shaterian  
WRIGHT, FINLAY & ZAK, LLP

By: /s/ Nicole K. Neff  
Nicole K. Neff, Esq.  
Attorneys for Defendant Cal-Western  
Reconveyance Corporation

**DECLARATION OF CONSENT**

Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the above-listed counsel for Defendants Wells Fargo Bank, N.A. and Cal-Western Reconveyance Corporation

Dated: November 21, 2011

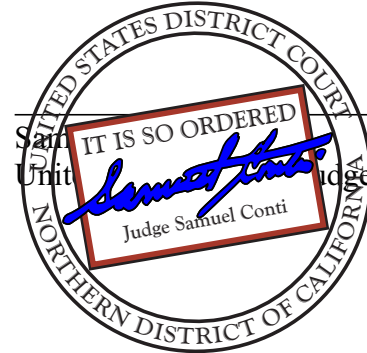
/s/ Viddell Lee Heard

Viddell Lee Heard

**ORDER**

PURSUANT TO STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED that the Case Management Conference currently scheduled for November 21, 2011 is continued to 2/10, 2012 at 10:00 ~~9:00~~ a.m.

Dated: 11/22/12



**CERTIFICATE OF SERVICE**

I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I am employed in the City of Pasadena, California; my business address is Anglin, Flewelling, Rasmussen, Campbell & Trytten LLP, 199 S. Los Robles Avenue, Suite 600, Pasadena, California 91101-2459.

On the date below, I served a copy of the following documents entitled:

**STIPULATION AND ORDER FOR CONTINUANCE OF NOVEMBER 29, 2011  
CASE MANAGEMENT CONFERENCE**

on all interested parties in said case addressed as follows:

***Served Electronically Via The Court's CM/ECF System:***

*Counsel for Plaintiff*

Neil Jon Bloomfield, Esq.  
Randall L. Hornibrook, Esq.  
BLOOMFIELD LAW GROUP, INC.  
901 E. St., Ste. 100  
San Rafael, CA 94901

Tel: 415.454.2294 Fax: 415.457.5348  
[njbloomfield@njblaw.com](mailto:njbloomfield@njblaw.com)

*Counsel for Defendant,*

*CAL-WESTERN RECONVEYANCE  
CORPORATION*

Robin Prema Wright, Esq.  
Nicole K. Neff, Esq.  
WRIGHT, FINLAY & ZAK, LLP  
4665 MacArthur Ct., Ste. 280  
Newport Beach, CA 92660

Tel: 949.477.5050 Fax: 949.477.9200  
[rwright@wrightlegal.net](mailto:rwright@wrightlegal.net)  
[nneff@wrightlegal.net](mailto:nneff@wrightlegal.net)

☐ **BY MAIL:** By placing the envelope for collection and mailing following our ordinary business practices. I am readily familiar with the firm's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in Pasadena, California, in sealed envelopes with postage fully thereon.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. This declaration is executed in Pasadena, California, on **November 21, 2011**.

Christine L. Daniel  
(Print name)

/s/ Christine L. Daniel  
(Signature)